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Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In Re:

ORBIT ENERGY & POWER, LLC,

Debtor.

Honorable Andrew B. Altenburg

Chapter 7

Bankr. No.: 22-19628(ABA)

Hearing Date: December 12, 2024  
@ 2:00 pm

**APPLICATION OF LEX NOVA LAW, LLC, ATTORNEYS FOR ANDREW SKLAR,  
CHAPTER 7 TRUSTEE, FOR ALLOWANCE OF THIRD INTERIM COMPENSATION  
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD JANUARY 1, 2024  
THROUGH SEPTEMBER 30, 2024**

TO THE HONORABLE ANDREW B. ALTENBURG, U.S. BANKRUPTCY JUDGE:

The Application of Lex Nova Law, LLC (“Applicant”), attorneys for Andrew Sklar, Chapter 7 Trustee herein (“Trustee”), for Allowance of Third Interim Compensation and Reimbursement of Costs Expended for the Period January 1, 2024 through September 30, 2024, respectfully states as follows:

1. Orbit Energy & Power, LLC (“Debtor”) filed a voluntary petition for relief pursuant to the provisions of Chapter 11 of the Bankruptcy Code on December 6, 2022 (the “Petition Date”).
2. The Chapter 11 case was converted to the instant Chapter 7 case by Order of this Court dated February 27, 2023.

3. Andrew Finberg was the Interim Trustee (the “Trustee”) in this Chapter 7 case, duly appointed and so-acting in this matter until August 30, 2023, when his appointment was vacated and Andrew Sklar was appointed as the successor Trustee (the “Successor Trustee”).

4. By Order of this Court dated March 15, 2023, Applicant was appointed as counsel for Andrew Finberg, effective March 7, 2023, the date the Application for Retention of Lex Nova Law, LLC was filed with the Court. Subsequent thereto, Applicant represented the Trustee in the within proceeding and before this Court. A copy of said Retention Order is annexed hereto and made part hereto as Exhibit “A”.

5. By Order of this Court dated September 13, 2023, Applicant was appointed as counsel for the Successor Trustee, effective September 3, 2023, the date the Application for Retention of Lex Nova Law, LLC was filed with the Court. Subsequent thereto, Applicant represented the Successor Trustee in the within proceeding and before this Court. A copy of said Retention Order is annexed hereto and made part hereto as Exhibit “B”.

6. By Order of this Court dated December 14, 2023, Applicant was granted first interim compensation for the period March 7, 2023 through August 30, 2023 in the amount of \$95,602.50 and reimbursement of expenses incurred in the amount of \$2,993.00 (the “First Interim Fee Order”). A true and correct copy of the First Interim Fee Order is attached hereto as Exhibit “C” and incorporated herein.

7. By Order of this Court dated May 23, 2024, Applicant was granted second interim compensation for the period September 3, 2023 through December 31, 2023 in the amount of \$54,782.00 and reimbursement of expenses incurred in the amount of \$1,402 (the “Second Interim Fee Order”). A true and correct copy of the Second Interim Fee Order is attached hereto as Exhibit “D” and incorporated herein.

8. Applicant files this Application pursuant to the applicable provision of Sections 327, 315 and 331 of the Bankruptcy Code seeking allowance of third interim compensation for time expended by Applicant in the representation of the Trustee for the period January 1, 2024 through September 30, 2024.

9. All services for which compensation is requested were performed for, and on behalf of, the Successor Trustee and not on behalf of any other party.

10. Applicant has rendered services during the pendency of this Chapter 7 proceeding on behalf of the Successor Trustee for the period January 1, 2024 through September 30, 2024 totaling 147.30 hours.

11. In accordance with the requirements of Bankruptcy Rule 2016(a), a detailed statement of legal services rendered by Applicant in the representation of the Trustee for the period January 1, 2024 through September 30, 2024, in the amount \$84,697.50 is annexed hereto and incorporated herein as Exhibit “E”, which sets forth a detailed description of the services rendered by each professional person, together with an itemization of the date upon which the service was performed, the amount of time expended for that service and the hourly billing rate of each professional person performing services.

12. The time expended by Applicant on behalf of the Trustee during the period January 1, 2024 through September 30, 2024 is summarized as follows:

Name of Professional & Title	Years Admitted (or Years of Professional Service)	HOURS	RATE	FEE
1. E. Richard Dressel, Esquire	1988	147.30	\$575/hr.	\$84,697.50
<b>FEE TOTALS</b>		147.30		<u>\$84,697.50</u>

13. During the period January 1, 2024 through September 30, 2024, Applicant incurred \$949.00 in expenses on behalf of the Trustee, which are also set forth in the statement of legal services annexed hereto as Exhibit “E”.

14. Applicant has performed all services necessary to represent the Trustee in the instant proceeding, including the following:

- Preparation of recovery demands and complaints re preferential/post-petition payments on account of pre-petition obligations and representation of Trustee in recovery adversary proceedings
- Representation of Trustee in connection with auction and private sales of vehicles, including filing of Motions and obtaining Orders approving Auction and Private Sales.
- Preparation of Settlement Agreements for preference/recovery demands and filing of Motions to Approve Settlements and obtaining Orders granting Motions to Approve Sales
- Oppose/resolve Motion of Republic Bank for Relief from the Automatic Stay regarding Set-off.
- Resolve issues with Maryland and Sewell, NJ landlords.
- Prepare Applications to Retain Quaker City/Eric Merback to conduct vehicle auction and private sales.
- Oppose/resolve Ally Bank, Santander Bank and Key Bank Motions for Relief from the Automatic Stay regarding various vehicles.
- Advise Trustee regarding with vehicles and claims of creditors secured by vehicles.
- Representation of Trustee vis-a-vis vehicles located at 570 Mantua, landlord issues.
- Representation of Trustee in connection with Zurich Insurance assertion of Chapter 11 and Chapter 7 Administrative claims.
- Preparation of Retention Application – Quaker City Auctioneers.
- Preparation of Fee Applications – Lex Nova Law LLC and Quaker City Auctioneers.
- Representation of Trustee regarding Zurich Insurance Proof of Claim and asserted Chapter 11 and Chapter 7 Administrative Claims
- Review/analysis re NJ Dept. of Labor audit results.
- Defense of Zurich Motion to Compel Payment of Chapter 7 and 11 administrative expenses.

15. Applicant believes that the compensation sought in the instant Application is fair and reasonable in light of the time and effort devoted, the responsibilities undertaken, the results

achieved, the quality and efficiency of the work done and any other factors which may be relevant to a determination of the reasonableness of the compensation sought.

WHEREFORE, Lex Nova Law, LLC respectfully requests that this Honorable Court enter an Order allowing third interim compensation to Applicant in the amount of \$84,697.50 for legal services rendered and allowing \$949.00 for reimbursement of expenses incurred during the period from January 1, 2024 through September 30, 2024 and for any additional relief as may be deemed just and proper.

Respectfully submitted,

Lex Nova Law LLC

/s/ E. Richard Dressel  
E. Richard Dressel, Esquire  
Attorneys for Andrew Sklar,  
Chapter 7 Trustee

Date: November 5, 2024